

# KING & SPALDING

King & Spalding LLP  
1185 Avenue of the Americas, 34th Floor  
New York, NY 10036-4003  
Tel: +1 212 556 2100  
Fax: +1 212 556 2222  
www.kslaw.com

Randy M. Mastro  
Partner  
Direct Dial: +1 212 827 4019  
RMastro@kslaw.com

January 24, 2025

## VIA ECF AND EMAIL

Hon. Richard J. Sullivan, U.S. Circuit Court Judge  
U.S. Court of Appeals for the Second Circuit  
500 Pearl Street, New York, NY 10007

Re: **Oakley v. MSG Networks, Inc., et al.; Case No. 17-cv-06903 (RJS)**

Dear Judge Sullivan:

We write on behalf of the MSG Defendants (collectively, “MSG”) and James Dolan pursuant to Rule 3 of Your Honor’s Individual Practices, concerning the parties’ submission of a joint discovery dispute letter regarding Mr. Dolan’s deposition. In the as-filed version of that letter, we have redacted discussion of the time, date, and location of Mr. Dolan’s deposition for the personal safety and executive security reasons described therein. *See Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 120 (2d Cir. 2006) (“[D]ocuments may be sealed if specific, on the record findings are made demonstrating that closure is essential to preserve higher values and is narrowly tailored to serve that interest.”); *In re Keurig Green Mountain Single-Serve Coffee Antitrust Litig.*, 2023 WL 196134, at \*3 (S.D.N.Y. Jan. 17, 2023) (“[T]he presumption of access has only modest weight where the document is submitted in connection with discovery motions, motions to compel testimony, and motions to exclude certain deposition testimony”). Accordingly, MSG requests leave to file an unredacted version of that letter under seal, at least on a temporary basis until after the deposition has taken place.

As always, we appreciate the Court’s consideration.

Defendants' request to file the unredacted joint letter motion (Doc. No. 277) under seal is GRANTED. The Court finds that the presumption in favor of open records has been outweighed by the potential security concerns of publicly disclosing the time, date, and location of James Dolan's deposition. See *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 120 (2d Cir. 2006). The Clerk of Court is respectfully directed to terminate the motion pending at Doc. No. 276.

Respectfully submitted,

/s/ Randy Mastro

Randy M. Mastro

SO ORDERED:

Dated: 1/27/2025



**RICHARD J. SULLIVAN**  
U.S.C.J., Sitting by Designation